

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

_____)	
In re:)	Chapter 7
)	
TERESA S. CAMDEN,)	Case No. 16-31606
)	
Debtor.)	
_____)	

**TRUSTEE'S APPLICATION FOR
EMPLOYMENT OF ATTORNEYS (SANDS ANDERSON PC)**

Bruce Matson, Trustee (the "**Trustee**"), by counsel that pursuant to 11 U.S.C. § 327 and Rule 2014 of the Rules of the Bankruptcy Procedure, hereby requests this Court authorize the employment of Sands Anderson PC to represent the Trustee and the estate in the above-styled case (the "**Case**") and in support thereof, states as follows:

Background

1. The Debtor filed for relief in the above-captioned Bankruptcy Court (the "**Court**") pursuant to Chapter 7 of 11 U.S.C. § 101 et seq. (the "**Bankruptcy Code**").
2. The Trustee was appointed interim trustee in the Case and continues to serve in that capacity.

Basis for Relief

3. The Trustee requires the assistance of legal counsel to provide advice and other services concerning the investigation and, if any, the prosecution of litigation to pursue recovery

Bruce H. Matson (Va. Bar No. 22874)
LeClairRyan, A Professional Corporation
919 East Main Street, 24th Floor
Richmond, Virginia 23219
(804) 343-4090

Trustee

of claims and/or other assets owed to the estate, including bank accounts, tax refunds, equipment and other tangible personal property and real estate and transfers and claimed exemptions relating to real estate. The engagement will be directed primarily at these matters, however, the scope of the engagement, if approved, will include any other matters for which the Trustee believes legal representation is needed and all matters the Trustee may assign to counsel proposed to be employed by this Application.

Attorneys to be Engaged

4. Due to the experience and expertise of its attorneys in bankruptcy, creditors' rights, litigation and other matters similar to the issues presented in this Case, the Trustee seeks to employ the law firm of Sands Anderson PC. The proximity of the attorneys at Sands Anderson PC to the Trustee will permit a more efficient delivery of legal services and prompt communication with the Trustee, which should result in an economy of expenses to the estate and a corresponding increase in recovery for the estate.

5. The Trustee proposes to compensation Sands Anderson PC for tis services in accordance with Sands Anderson PC's normal billing practice, which is to record and bill the time of Sands Anderson PC's professionals at the firm's regular hourly rates for its partners, associates and paralegals for its legal services. Generally, for Trustee matters in Virginia the range of Sands Anderson PC's hourly rates are between \$285.00 and \$385.00 per hour for counsel/partners, \$235.00 to \$250.00 for associates and \$150.00 for paralegals. Sands Anderson PC's rates are reviewed, and when deemed appropriate, adjusted annually. Sands Anderson PC will utilize paralegals from time to time where the tasks required can be accomplished by a paralegal with a corresponding reduction in the applicable hourly rate. The Trustee will also

reimburse Sands Anderson PC for its out-of-pocket expenses incurred in connection with the engagement proposed herein.

6. Subject to approval by the Court, this Application shall constitute the Trustee's agreement to employ and compensation Sands Anderson PC. The Trustee has advised Sands Anderson PC that its compensation will be in accordance with 11 U.S.C. § 330, in compliance with Rule 2016 of the Federal Rules of Bankruptcy Procedure (and any applicable Local Rules), and subject to the approval of this Court.

Legal Authority

7. The Bankruptcy Code authorizes trustees to employ professionals to assist the trustee in completing the trustee's duties in a case such as this one. Specifically, 327(a) of the Bankruptcy Code provides, in pertinent part, as follows:

Except as otherwise provided in this section, the trustee, with the court's approval, may employ one or more attorneys, accountants, appraisers, auctioneers, or other professional personal, that do not hold or represent an interest adverse to the estate, and that the disinterested persons, to represent or assist the trustee in carrying out the trustee's duties under this title.

11 U.S.C. § 327(a). In addition, Section 327(d) of the Bankruptcy Code provides:

The court may authorize the trustee to act as attorney or accountant for the estate if such authorization is in the best interest of the estate.

11 U.S.C. § 327(d). Accordingly, the Trustee asserts that the relief requested is supported by applicable law and is in the best interest of the estate.

8. Except as described herein, the Trustee believes that Sands Anderson PC does not have any connections with the Debtor, creditors, or any other party in interest or their respective

attorneys and accountants that would prevent Sands Anderson PC from being a “disinterested person” within the meaning of § 101(14) of the Bankruptcy Code. Filed contemporaneously herewith as Exhibit A hereto is the Attorney’s Disclosure Statement attesting to the status, condition and/or exceptions to any of these connections.

Notice

9. Notice of this Application has been given to the parties listed on the attached Certificate of Service. The Trustee submits that no other or further notice is required.

WHEREFORE, Bruce H. Matson, Trustee, by counsel, hereby requests that this Court to (i) approve the employment of Sands Anderson PC by entering the proposed Order Authorizing Employment of Attorneys (Sands Anderson PC), a copy of which is attached hereto as Exhibit B, and (ii) grant such other relief concerning this Application as may be appropriate.

BRUCE H. MATSON, TRUSTEE

/s/ Bruce H. Matson
Trustee

Bruce H. Matson (Va. Bar No. 22874)
LeClairRyan, A Professional Corporation
919 East Main Street, 24th Floor
Richmond, Virginia 23219
(804) 343-4090

Trustee

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June, 2016, a true and correct copy of this Trustee's Application For Employment of Attorneys (Sands Anderson PC) was sent by first-class mail, postage prepaid, and/or electronic delivery to all parties receiving electronic notification and to:

Robert Van Arsdale
Office of the U.S. Trustee
701 East Broad Street – Suite 4304
Richmond, Virginia 23219
Assistant U.S. Trustee

Sharon C. Stuart, Esquire
Stuart Law Firm, LLC
2222 Monument Avenue
Richmond, Virginia 23220
Counsel for Debtor

/s/ Bruce H. Matson _____
Trustee

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

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In re:)	Chapter 7
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ATTORNEY'S DISCLOSURE STATEMENT

COMMONWEALTH OF VIRGINIA:
CITY OF RICHMOND:

This day, C. Thomas Ebel, personally appeared before me, the undersigned Notary Public, in my jurisdiction aforesaid, and being first duly sworn, stated as follows:

1. I am an attorney at law duly licensed to practice in Virginia and admitted to practice in the above-captioned court.
2. I am an officer with the law firm of Sands Anderson PC, which maintains offices at 1111 East Main Street, Richmond, Virginia, as well as in Fredericksburg, McLean and Christiansburg, Virginia, and Raleigh, North Carolina. The Trustee in the above-captioned case (the "Case") has requested that Sands Anderson PC represent the Trustee in connection with certain matters in the Case.
3. Except as provided in paragraph 4 below, to the best of my knowledge, neither I nor any other member of the firm of Sands Anderson PC has or represents any interest adverse to the captioned Debtor or the estate; nor do I or any member of Sands Anderson PC have any connection with the Debtor or the estate; nor am I aware of any connection or relationship with any party in the Case, including the Office of the United States Trustee, or their respective professionals that would prevent Sands Anderson PC from not being a "disinterested person" in the Case within the meaning of § 101(14) of the United States Bankruptcy Code.


4. [None]

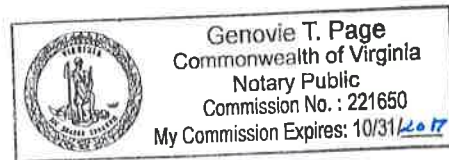
Affiant:


/s/ C/ Thomas Ebel
Affiant

Subscribed and sworn to before me this 13th day of June, 2016.

My Commission Expires: 10 / 31 / 2017.

/s/ Genovie T. Page 
Notary Public
ID # 221650



UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

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Debtor.)	
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ORDER APPROVING TRUSTEE'S EMPLOYMENT OF ATTORNEYS

This matter came before the Court upon the Trustee's Application for Employment of Attorneys (Sands Anderson PC) (the "**Application**"). After proper notice and due consideration, it is hereby ORDERED as follows:

1. The Trustee's employment of Sands Anderson PC in accordance with the terms of the Application to serve as attorneys to the Trustee should be and hereby is approved.
2. Subject to approval of the Court, the employment approved by this Order shall be compensated as provided in the Application and in accordance with 11 U.S.C. § 330.

Upon entry of this Order, the Clerk is directed to forward copies to all parties on the Service List attached hereto.

ENTERED:

UNITED STATES BANKRUPTCY JUDGE

Bruce H. Matson (Va. Bar No. 22874)
LeClairRyan, A Professional Corporation
919 East Main Street, 24th Floor
Richmond, Virginia 23219
(804) 343-4090

Trustee

I ASK FOR THIS:

Bruce H. Matson (Va. Bar No. 22874)
LeClair Ryan, A Professional Corporation
919 East Main Street, 24th Floor
Richmond, Virginia 23219
(804) 343-4090

Trustee

SEEN AND NO OBJECTION:

Robert Van Arsdale
Office of the U.S. Trustee
701 East Broad Street, Suite 4304
Richmond, Virginia 23219
(804) 771-2310

Assistant U.S. Trustee

CERTIFICATE OF ENDORSEMENT

I hereby certify that the foregoing Order Approving Trustee's Employment of Attorneys has been endorsed by all necessary parties.

Trustee

SERVICE LIST

Robert Van Arsdale
Office of the U.S. Trustee
701 East Broad Street – Suite 4304
Richmond, Virginia 23219
Assistant U.S. Trustee

Sharon C. Stuart, Esquire
Stuart Law Firm, LLC
2222 Monument Avenue
Richmond, Virginia 23220
Counsel for Debtor